

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1:24-bk-03264-HWV
IRENE PAPOUTSIS MULKERIN :
: Chapter 7
Debtor :
:

**REPLY TO DEBTOR’S MOTION UNDER RULE 2004 TO COMPEL
DOCUMENT PRODUCTION AND TO TOLL OR CLARIFY CONTRACTUAL
120-DAY LIMITATIONS PERIOD SET FORTH IN SETTLEMENT
AGREEMENT**

The Reply of The Andrew V. Papoutsis Irrevocable Trust (the “Trust”) to the Motion (the “Motion”) of Irene Papoutsis Mulkerin (“Debtor”) Under Rule 2004 to Compel Document Production and to Toll or Clarify Contractual 120-Day Limitations Period Set Forth in Settlement Agreement (Dkt. 518), is as follows:

1. As stated many times the Trust has provided settlement funds with respect to a settlement reached by the Chapter 7 Trustee and certain claims of the Debtor concerning the Trust.
2. The Settlement was approved by the Court by Order dated May 28, 2025 (Dkt. 410).
3. The Debtor is not a party to the settlement as all rights to the settlement are placed upon the Chapter 7 Trustee.
4. While it is possible that the Debtor may receive some funds from the Settlement, as there may be a surplus, to date, distribution has not yet occurred and, accordingly, the Debtor is not a party to the settlement.

5. The Trust is securing the funds by virtue of certain financing that has been obtained as previously set forth in Court. The documents with respect to the obtaining of these funds are not relevant to the Settlement, other than such funds are available.

6. The Debtor has no rights to see such documents if that is what the Debtor is requesting in Document Number 518.

7. The 120-day period of time set forth in the Settlement Agreement is no longer relevant as the Court approved the Settlement Agreement.

8. There is no provision in the Bankruptcy Rules of Procedure or in the Federal Rules of Civil Procedure for filing the pleading at Document Number 518.

WHEREFORE, it is respectfully requested that this Court deny any requests for relief to the Debtor that may be set forth in document 518.

Respectfully submitted:

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& WARSHAWSKY, P.C.

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